
EXHIBIT 3

1 UNITED STATES DISTRICT COURT OF MASSACHUSETTS

2 BOSTON DIVISION

3
4 GIBSON FOUNDATION, INC., A Delaware Corporation,

5 Plaintiff,

6 -against-

7 Case No.
8 1:20-CV-10682-IT

9 ROB NORRIS d/b/a THE PIANO MILL,
10 A CITIZEN OF MASSACHUSETTS; THE
PIANO MILL GROUP, LLC,

11 Defendants.

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12 DEPOSITION OF

13 ROBERT NORRIS

14
15 June 25, 2021

16 10:02 a.m.

17 Job No: 381641

18
19 VIDEO CONFERENCE

20
21 DEANNA JACKSON
22 Notary Public - New York State
23 Qualified in New York City
My Commission No. 01JA624392
24 Expires August 29, 2023

Transcript of Robert Norris
Conducted on June 25, 2021

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1 Q. Were you asking to have a piano to restore and
2 give it back to them, or have a piano to restore and
3 keep?

4 A. Have a piano to restore, and keep.

5 Q. After these e-mails with Tom, what happened to
6 lead you to be in the possession of the Liberace
7 Piano?

8 A. I believe he gave me the number of Bill
9 Knauer -- at this time line, with this e-mail,
10 nothing further took place. We had this conversation
11 and nothing took place until another conversation
12 that I had with Tom.

13 Q. Was that conversation through e-mail?

14 A. I believe it was a phone conversation.

15 Q. What was that conversation about?

16 A. I believe he called me and said "We might have
17 an SD-10 that you would be interested in. I'm not
18 sure if it really is what you're looking, but here's
19 the number of Jim Felber, call him."

20 Q. What happened with that?

21 A. I called Mr. Felber.

22 Q. What was that conversation?

23 A. I think there was more than one conversation.
24 I think the first conversation he told me that there

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1 was an SD-10 in the Hammerstein Ballroom. He said it
2 was online if I would get it out. It was there for a
3 very short period of time. I believe he said, it's
4 all yours, but you have to get it out by the end of
5 the week, which was not a small task because it was
6 in New York city, and I believe it was on the 7th
7 floor.

8 Q. What happened after that?

9 A. I called him again, and told him that I
10 couldn't get down there within the allotted time with
11 a crew. I didn't say I couldn't get down there, I
12 said I couldn't get my moving crew down there within
13 the allotted time to get it.

14 Q. Did you tell him that you could pick it up?

15 A. Yes.

16 Q. Was there any written communication, or was it
17 all telephone?

18 A. I don't believe so.

19 Q. Do you remember the date he said you had to
20 pick it up by?

21 A. No.

22 Q. Was it in 2011?

23 A. Yes.

24 Q. Where did you pick it up from?

Transcript of Robert Norris
Conducted on June 25, 2021

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1 A. He's say that after we received the piano,
2 okay. That may have been when we had that
3 conversation then.

4 Q. So, you did talk to him after you received the
5 piano?

6 A. I don't know.

7 Q. Well, you would have called him back as he
8 kind of asked you to call him?

9 A. I think that's fair to say.

10 Q. You mentioned earlier that you had been given
11 an number of free pianos, can you tell me about those
12 instances?

13 A. It happens almost on a weekly basis, maybe
14 even a weekly basis that we did call for some people
15 that want to give us their piano. Oftentimes, we
16 say, sorry, we don't have use of this piano, and
17 other times, we say, okay, and other times the only
18 thing we can do is remove it for a fee. We do all
19 the above. It happens all the time.

20 Q. Are these individuals, or are these
21 manufacturers?

22 A. No, not manufacturers. Sometimes they are
23 churches, you know, individuals, or places that have
24 pianos.

Transcript of Robert Norris
Conducted on June 25, 2021

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1 Q. But, Baldwin piano doesn't call you every week
2 and say, hey, here's a piano?

3 MR. GIBSON: Objection.

4 A. I didn't hear you.

5 Q. So, Baldwin Piano doesn't call you every week
6 and say, hey, we have a free piano for you?

7 A. No.

8 Q. What conditions are those pianos usually in?

9 A. Various conditions. Sometimes they are very
10 good, other times they are wrecks, and very unclean.

11 Q. What about the value of those pianos, about
12 how much would you say they are they worth when they
13 give them away?

14 A. Again, it varies from, you know, we're being
15 paid to remove, and disposition. Yes, I actually
16 have two Baldwin SD-10s in my possession right now.
17 Same piano, same manufacturer, same piano, an SD-10
18 concert grand. One was given to us, I believe it was
19 a church, the other was we were paid to remove, and
20 dispose, but I kept it, and both are in storage, and
21 we intend to restore them at some point.

22 So, one was free, the other one we were paid
23 to remove. The only difference between those and the
24 Liberace is the balance (phonetic), and the fact that

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1 they don't have rhinestones on them, but other than
2 that, they are the same type piano.

3 Q. How much were the pianos worth when you picked
4 them up?

5 A. Well, obviously they weren't worth anything
6 because people were giving them to us, and most
7 likely these people that are giving us these pianos,
8 they discovered that over time. They first think
9 maybe it has value, maybe they think it has a lot of
10 the value, and they gradually realize that they can't
11 give it away.

12 Q. What do you say the retail value, or the
13 resale value of those pianos when you pick them up
14 would have been?

15 A. When I pick them up?

16 Q. Yes.

17 A. Retail value nothing, you know, zero to
18 \$5,000, somewhere in there. That would involve based
19 on, you know, the person, or entity that's interested
20 in the piano.

21 Q. But, as the piano seller, how much would you
22 have been able to get for those pianos at that time?

23 A. Well, not very much. Without doing the
24 restoration, not very much. It all depends on the